

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ULYSSES RODRIGUEZ CHARLES,

Plaintiff,

v.

CITY OF BOSTON, STANLEY BOGDAN,
JOHN MULLIGAN, WILLIAM KEOUGH,
PAUL RUFFO, KATHLEEN HANLEY
JOHNSON, and JOHN DOE and JANE DOE,
supervisors in the Boston Police Department,

Defendants.

C.A. No. 04-10986-NG

**ASSENTED-TO MOTION TO ENLARGE TIME
TO RESPOND TO DEFENDANTS STANLEY BOGDAN
AND CITY OF BOSTON'S MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiff Ulysses R. Charles hereby respectfully submits this assented-to motion to enlarge the period for filing a response to the motion for judgment on the pleadings of Defendants Stanley Bogdan and City of Boston. Mr. Charles seeks an enlargement to January 10, 2006.

As grounds for this motion, Mr. Charles states as follows:

1. The Defendants have assented to the relief requested herein and will not be prejudiced by the allowance of this motion.

2. The Defendants' motion seeks judgment as a matter of law on all of Mr. Charles' claims against them.

3. Mr. Charles seeks an enlargement of time for responding to the motion, due to the intense litigation schedule of his counsel compounded with the occurrence of the holidays.

4. In light of the potentially dispositive effect of the motion, Mr. Charles respectfully requests that the Court grant the enlargement, so that he may adequately respond to the motion.

5. This motion is timely made within the original due date for a response. No other enlargements have been sought in connection with the Defendants' pending motion.

WHEREFORE, Mr. Charles respectfully requests, in the interests of justice and for all of the forgoing reasons, that the Court grant this assented-to motion and allow him until January 10, 2006 to file his response to the motion for judgment on the pleadings.

DATED: December 27, 2005
Boston, MA

Respectfully submitted,

/s/ Mayeti Gametchu
Kevin J. O'Connor (BBO# 555250)
Mayeti Gametchu (BBO# 647787)
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Attorneys for Plaintiff
ULYSSES RODRIGUEZ CHARLES

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Pursuant to L.R. D. Mass. 7.1(A)(2), I, Mayeti Gametchu, hereby certify that I conferred with Thomas Donohue, Esq., counsel for Defendants Stanley Bogdan and the City of Boston, on December 27, 2005. Counsel for Defendants Stanley Bogdan and the City of Boston assents to the relief sought in the instant motion.

/s/ Mayeti Gametchu

CERTIFICATE OF SERVICE

I, Mayeti Gametchu, hereby certify that, on December 27, 2005, I caused a true and correct copy of the foregoing motion to be served by first-class mail, postage paid, upon Thomas Donohue, Esq., Assistant Corporation Counsel, City of Boston Law Dept., City Hall, Room 615, Boston, MA 02201, counsel for Defendants Stanley Bogdan and the City of Boston.

/s/ Mayeti Gametchu

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